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October 12, 2005

VIA E-MAIL AND US MAIL

Alessandro A. Iuppa, Superintendent
ATTN: Vanessa J. Leon, Docket No. INS-05-700
Bureau of Insurance
Maine Department of Professional & Financial Regulation
34 State House Station
Augusta, ME 04333-0034

RE: In Re: Review of Aggregate Measurable Cost Savings Determined by Dirigo Health for the First Assessment Year
Docket No. INS-05-700

Dear Superintendent Iuppa:

Enclosed for filing in the above-referenced matter please find the original and one (1) copy of the following documents:

1. Filing Cover Sheet; and
2. Objections Of The Maine Automobile Dealers Association Insurance Trust And The Bankers Health Trust To The Information Request Propounded By The Consumers For Affordable Health Care.

Thank you for your attention to this matter.

Very truly yours,

/s/ Roy T. Pierce

Roy T. Pierce

RTP:Imm

cc: John Kelly (Via U.S. Mail & Email)
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William H. Laubenstein, III, Esq. (Via Email)
Christopher T. Roach, Esq. (Via Email)
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bcc: Mark Walker, Esq. (Via U.S. Mail & Email)
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STATE OF MAINE
DEPARTMENT OF PROFESSIONAL AND FINANCIAL REGULATION
BUREAU OF INSURANCE

IN RE: REVIEW OF AGGREGATE)	OBJECTIONS OF THE MAINE
MEASURABLE COST SAVINGS)	AUTOMOBILE DEALERS
DETERMINED BY DIRIGO)	ASSOCIATION INSURANCE TRUST
HEALTH FOR THE FIRST)	AND THE BANKERS HEALTH
ASSESSMENT YEAR)	TRUST TO THE INFORMATION
)	REQUEST PROPOUNDED BY THE
)	CONSUMERS FOR AFFORDABLE
DOCKET NO. INS-05-700)	HEALTH CARE

NOW COME the Intervenors, the Maine Automobile Dealers Association Insurance Trust and the Bankers Health Trust (collectively, "the Trusts"), by and through their undersigned counsel, and, pursuant to Bureau of Insurance Rule 350(10) and the Superintendent's Procedural Order dated September 19, 2005, object to the information request propounded to them by the Consumers for Affordable Health Care ("CAHC") as follows:

Request Nos. 9-10: The Trusts object to Request Nos. 9-10 on the ground that they are overbroad and unduly burdensome insofar as they seek to require the Trusts to identify and assign a dollar figure to every conceivable cost increase or cost savings in the Maine health insurance market during the First Assessment Year.

Request No. 11: CAHC has now withdrawn Request No. 11.

Request No. 12: The Trusts object to Request No. 12 on the ground that it is grossly overbroad, unduly burdensome, and, given the sheer number of participants in the marketplace, incapable of the single generalized answer sought.

Request No. 14: The Trusts object to Request No. 14 on the ground that it is not clear what they are being asked--are they being asked whether their position is that: (1) CMAD

necessarily increases or decreases with mere changes in volume; or (2) whether changes in volume impact increases and decreases in CMAD?

Request No. 16: The Trusts object to Request No. 16 on the ground that it seeks information that is not relevant to the subject matter of this proceeding. As set forth in P.L. 2005, ch. 400, § B-2(2)(B), and reiterated in the Superintendent's Second Procedural Order dated October 11, 2005, the Superintendent's charge here is to approve, in whole or in part, or disapprove the Board's Filing. Since the Board's Filing, therefore, defines the outer limits of measurable cost savings attributable to the operation of the Dirigo Health Program for the First Assessment Year, the Trusts' position with respect to an alleged element of cost savings rejected by the Dirigo Board is irrelevant.

Request No. 17: The Trusts object to Request No. 17 on the ground that it is not clear which "methodology" to which CAHC is referring, nor is it clear what is meant by the term "other Dirigo Initiatives" analyzed by Mercer, since that term does not appear in the September 19, 2005 Report referenced in the request.

Dated: October 12, 2005

Respectfully submitted,

/s/ Roy T. Pierce

Bruce C. Gerrity, Bar No. 2047
Roy T. Pierce, Bar No. 7541

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CERTIFICATE OF SERVICE

I hereby certify that on this date the foregoing document was served on all counsel of record via first electronic mail as follows:

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Dated: October 12, 2005

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